

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In The Matter of the Procurement of	:	
Standard Service Offer Generation as	:	Case No. 12-2742-EL-UNC
Part of the Third Electric Security Plan	:	
for Customers of Ohio Edison	:	
Company, The Cleveland Electric	:	
Illuminating Company, and The Toledo	:	
Edison Company.	:	

MOTION FOR A PROTECTIVE ORDER
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

Comes now the Staff of the Public Utilities Commission of Ohio (Staff) and requests that both the Report of the Commission's Consultant Regarding FirstEnergy's January 2015 Standard Service Offer Auction and the Notification of CBP Auction Results be kept confidential pursuant to O.A.C. Rule 4901-1-24 for the reasons set forth in the attached memorandum in support.

Respectfully submitted,

/s/ Thomas W. McNamee

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
614.466.4396 (telephone)
614.644.8764 (facsimile)

thomas.mcnamee@puc.state.oh.us

MEMORANDUM IN SUPPORT

Staff requests that the Commission keep both the Report of the Commission's Consultant Regarding FirstEnergy's January 2015 Standard Service Offer Auction and the Notification of CBP Auction Results confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the January 2015 FirstEnergy auction. This information is highly competitively sensitive. Public disclosure of this information would be highly prejudicial to the bidding parties and to the viability of any future auction in Ohio. Keeping this material confidential is consistent with the Commission's actions in prior auction matters. A redacted version of the Notification of CBP Auction Results has been filed publicly in this docket.

Respectfully submitted,

/s/ Thomas W. McNamee

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
614.466.4396 (telephone)
614.644.8764 (facsimile)
thomas.mcnamee@puc.state.oh.us

PROOF OF SERVICE

I certify that a true copy of the foregoing **Motion for a Protective Order** submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served by regular U.S. mail, postage prepaid, or via electronic mail, upon the following parties of record, this 28th day of January, 2015.

/s/ Thomas W. McNamee

Thomas W. McNamee

Parties of Record:

Samuel C. Randazzo
Joseph M. Clark
McNees Wallace & Nurick LLC
21 East State St., 17th Floor
Columbus, OH 43215
sam@mwncmh.com
jclark@mwncmh.com

Colleen L. Mooney
231 West Lima Street
PO Box 1793
Columbus, OH 43215
cmooney2@columbus.rr.com

Lance M. Keiffer
420 Madison Ave., Suite 100
Toledo, OH 43604-1219
lance.keiffer@toledo.oh.gov

Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
mkl@bbrslaw.com

Nolan Moser
Bell & Royer, LPA
33 South Grant Avenue
Columbus, OH 43215
nmoser@theoec.org

Michael L. Kurtz
David F. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@BKLawfirm.com
dboehm@BKLawfirm.com

Jeffrey L. Small
Gregory J. Poulos
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street
18th Floor
Columbus, OH 43215-3485
small@occ.state.oh.us
poulos@occ.state.oh.us
reese@occ.state.oh.us

Craig I. Smith
2824 Coventry Road
Cleveland, Ohio 44120
wis29@yahoo.com

Dane Stinson
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
Dane.Stinson@BaileyCavalieri.com

Glenn S. Krassen
Matthew W. Warnock
Bricker & Eckler LLP
1375 E. 9th St., Suite 1500
Cleveland, OH 44114
gkrassen@bricker.com
mwarnock@bricker.com

M. Howard Petricoff
Vorys, Sater, Seymour and Pease, LLP
52 East Gay St.
PO Box 1008
Columbus, OH 43216-1008
mhpetricoff@vorys.com

Jacqueline Lake Roberts
Regulatory Affairs and Public Policy
101 Federal Street, Suite 1100
Boston, MA 02110
jroberts@enernoc.com

Teresa Ringenbach
5400 Frantz Rd., Suite 250
Dublin, OH 43016
teresa.ringenbach@directenergy.com

Matthew S. White
Chester Wilcox & Saxbe, LLP
65 E. State St., Suite 1000
Columbus, OH 43215
mwhite@cwslaw.com

Theodore S. Robinson
2121 Murray Avenue
Pittsburgh, PA 15217
robinson@citizenpower.com

Michael D. Dortch
Kravitz, Brown & Dortch, LLC
63 E. State St., Suite 200
Columbus, OH 43215
mdortch@kravitzllc.com

Michael E. Heintz
Staff Attorney
1207 Grandview Ave.
Suite 201
Columbus, Ohio 43212
mheintz@elpc.org

Eric D. Weldele
Tucker, Ellis & West, LLP
1225 Huntington Center
41 South High Street
Columbus, OH 43215-6197
eric.weldele@tuckerellis.com

Joseph P. Meissner
Matthew D. Vincel
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, OH 44113
jpmeissn@lasclev.org

Richard L. Sites
155 E. Broad Street, 15th Floor
Columbus, OH 43215-3620
ricks@ohanet.org

Gregory K. Lawrence
28 State Street
McDermott Will & Emory LLP
Boston, MA 02109
glawrence@mwe.com

Henry W. Eckhart
50 West Broad Street, #2117
Columbus, Ohio 43215
henryeckhart@aol.com

Amy Spiller
Duke Energy Business Services, Inc.
221 E. Fourth St., 25 Fl.
Cincinnati, OH 45202
amy.spiller@duke-energy.com

Cheri B. Cunningham
Director of Law
161 South High Street
Suite 202
Akron, OH 44308
ccunningham@akronohio.gov

Laura C. McBride
James F. Lang
Calfee, Halter & Griswold
1400 KeyBank Center
800 Superior Avenue
Cleveland, OH 44114
lmcbride@calfee.com

Steven Huhman
Morgan Stanley
2000 Westchester Ave.
Purchase, NY 10577
steven.huhman@morganstanley.com

Christopher Miller
Schottenstein Zox & Dunn Co., LPA
250 West St.
Columbus, OH 43215
cmiller@szd.com

Thomas Froehle
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215-4228
tfroehle@mwncmh.com

David A. Kutik
Jones Day
901 Lakeside Avenue
Cleveland, OH 44114
dakutik@jonesday.com

Charles Faruki
D. Jeffrey Ireland
Faruki, Ireland & Cox
500 Courthouse Plaza, S.W.
10 North Ludlow Street
Dayton, OH 45402
cfaruki@ficlaw.com
direland@ficlaw.com

Laura Chappelle
4218 Jacob Meadows
Okemos, MI 48864
laurac@chappelleconsulting.net

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/28/2015 3:07:47 PM

in

Case No(s). 12-2742-EL-UNC

Summary: Motion for a Protective Order submitted by Assistant Attorney General Thomas McNamee on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio